



S00002527

March 2006

RCRAInfo CM&E EVALUATION – VIOLATION FORM

*EPA ID Number		PAD987335247			EIN		
Handler Name		Manderbach Ford					
Street		4450 5 th St. Highway					
City		Temple		State	PA	Zip Code	19560
Actual Generator Status <i>Check only if different from Notified Status.</i>				LQG <input type="checkbox"/> SQG <input checked="" type="checkbox"/> CESQG <input type="checkbox"/> Closed <input type="checkbox"/> Non-Handler <input type="checkbox"/>			
Universe Change Required? <i>(Generator Status Change Required)</i>		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Universe Change Section (on reverse side of this form).					
RCRA Non-Notifier?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).					
Other Facility Information Changes?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).					
*EVALUATION		<input checked="" type="checkbox"/> Add		<input type="checkbox"/> Update		<input type="checkbox"/> Delete	
<i>You must provide an Evaluation Identifier (also known as the Sequence Number).</i>							
*Evaluation Identifier	*Type	*Evaluation Start Date (mm/dd/yyyy)		*Agency	Responsible Person	Suborganization	
	CEI	7/12/2006		S	BLM	WM	
Day Zero (mm/dd/yyyy): You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNN, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNN evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.				7/12/2006 Reclassified SV Date: Only applicable for SNN evaluation type as appropriate.			
Notes:				Violations Noted			
Evaluation Indicator Field (Check all that apply) <input type="checkbox"/> Citizen Complaint <input type="checkbox"/> Multimedia Inspection <input type="checkbox"/> Sampling <input type="checkbox"/> Not Subtitle C							
Focused Coverage Areas (Use Only for Evaluation Type FCI) <i>Regulation-Specific FCI</i> BIF <input type="checkbox"/> CCI <input type="checkbox"/> CFI <input type="checkbox"/> INC <input type="checkbox"/> LDR <input type="checkbox"/> PTB <input type="checkbox"/> PTX <input type="checkbox"/> THI <input type="checkbox"/> UIC <input type="checkbox"/> UOI <input type="checkbox"/> UWR <input type="checkbox"/> OTHER (specify): _____ <i>Routine/Standardized FCI</i> CAR <input type="checkbox"/> CPC <input type="checkbox"/> DOS <input type="checkbox"/> EMR <input type="checkbox"/> IEI <input type="checkbox"/> ISI <input type="checkbox"/> RTI <input type="checkbox"/>							
Does this Evaluation Add/Update/Delete a Violation?				YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		<i>If Yes, fill in the Violations Section(s) on page 2 of this form.</i>	
Does this Evaluation link to a Commitment?				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		<i>If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.</i>	
Does this Evaluation link to a 3007 Request?				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		<i>If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.</i>	
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION?				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		<i>If Yes, fill in information below.</i>	
*Seq. No.	*Violation Type	*Agency	*Regulation Citation (Type + Citation) (ex. FR 262.1)			*Date Determined (mm/dd/yyyy)	

*Required Fields

EPA ID Number				Handler Name			
PAD987335247				Manderbach Ford			
VIOLATIONS SECTION (Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form)							
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete						Link to Above Evaluation <input checked="" type="checkbox"/>	
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier		Actual RTC Date (mm/dd/yyyy)	
	262.C	S	7/12/2006	<input type="radio"/> A RTC Qualifier is required if entering an Actual RTC Date.		7/14/2006	
Notes:							
LINK CITATIONS TO ABOVE VIOLATION?				YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in information below	
Citation Type		Citation		Citation Type		Citation	
FR		40 CFR 262.34(a)(2)					
FR		40 CFR 262.34(a)(3)					
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete						Link to Above Evaluation <input type="checkbox"/>	
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier		Actual RTC Date (mm/dd/yyyy)	
	265.I	S	7/12/2006	<input type="radio"/> A RTC Qualifier is required if entering an Actual RTC Date.		7/14/2006	
Notes:							
LINK CITATIONS TO ABOVE VIOLATION?				YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in information below	
Citation Type		Citation		Citation Type		Citation	
SS		25 PA Code 265a.179					
HANDLER SECTION (Fill out if RCRA Non-Notifier)							
Handler Name			Contact				
Street							
City			State	Zip Code			
County							
UNIVERSE CHANGE SECTION (Fill out if Universe Change Required)							
i. Indicate the Facility's current Universe(s):							
ii. Indicate the new RCRAInfo Generator Universe: <i>Note: All TSD activity changes must be handled by the IOR and cannot be made using this form.</i>				LQG <input type="checkbox"/> SQG <input type="checkbox"/> CEG <input type="checkbox"/> Non-Handler <input type="checkbox"/> Closed <input type="checkbox"/>			
iii. Indicate the new transporter status: (Only fill out if the facility requires a transporter status change)			Transporter <input type="checkbox"/> <i>If the transporter box is checked, you must check at least one mode of transportation below:</i> <input type="checkbox"/> Air <input type="checkbox"/> Water <input type="checkbox"/> Rail <input type="checkbox"/> Other <input type="checkbox"/> Highway			Non-Transporter <input type="checkbox"/> Check non-transporter if the facility is currently listed in RCRAInfo as a transporter AND no longer transports hazardous waste.	

*Required Fields

RCRAINFO CM&E ADDITIONAL VIOLATIONS FORM*(Attach to RCRAinfo CM&E Evaluation – Violation Form, if appropriate)*

EPA ID Number	Handler Name
PAD987335247	Manderbach Ford

VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete	Link to Above Evaluation <input checked="" type="checkbox"/>
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Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
	262.A	S	07/12/06	<input type="radio"/> A RTC Qualifier is required if entering an Actual RTC Date.	07/14/06

Notes:

LINK CITATIONS TO ABOVE VIOLATION?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below
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Citation Type	Citation	Citation Type	Citation
SS	SWMA 6018.403(b)(2)		

VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete	Link to Above Evaluation <input checked="" type="checkbox"/>
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Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
	265.I	S	07/12/06	<input type="radio"/> A RTC Qualifier is required if entering an Actual RTC Date.	07/14/06

Notes:

LINK CITATIONS TO ABOVE VIOLATION?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below
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Citation Type	Citation	Citation Type	Citation
FR	40 CFR 265.174		

VIOLATION <input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete	Link to Above Evaluation <input type="checkbox"/>
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Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
				<input type="radio"/> A RTC Qualifier is required if entering an Actual RTC Date.	

Notes:

LINK CITATIONS TO ABOVE VIOLATION?	YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below
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Citation Type	Citation	Citation Type	Citation



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

Inspection Date 7/12/06 - 7/14/06

Time Start _____

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT☐ **GENERATOR**☒ **S Q GENERATOR**Efacts # 1549956Company name Manderbach FordEPA I.D. Number PAD987335247

Employer I.D. Number (EIN) _____

Site Address 4450 5th St. Highway, Temple PACounty BerksMunicipality Muhlenberg TwpZip 19560Name of Inspector Brian L. MooreName & Title of Responsible Official Keith Nolan - Service ManagerPerson Interviewed Keith NolanTelephone (610) 929-3683

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: 50 Pounds _____ Kgs**1. Site Characterization:**STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad**2. Universal Waste:** ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:Transporter Name Waste Recovery Solutions, Inc License Number PA AH 0683

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
<u>D001, D035, F005, P003</u>	<u>PAINT Waste Related Material</u>	<u>Sarthan Chemical and Solvents Co.</u>
		<u>Sumter, S.C. 29151</u>

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Manderbach Ford ID Number PAD987335247 Date 07/14/06

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
	X			Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
X				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
X				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
	X			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
	X			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
	X			Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Manderbach Ford ID Number PAD987335247 Date 07/14/06

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4				REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
			X	Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
			X	Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
			X	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
			X	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
			X	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 07/14/06 Identification Number PAD987335247

Company/Facility/Site Name Manderbach Ford

On July 12, 2006 I began a compliance evaluation inspection at Manderbach Ford. The inspection was completed on July 14, 2006 with the records review. Keith Nolan accompanied me on the site tour and records review.

Observations:

- 1) Manderbach Ford generates their waste in their body shop with waste paints and thinners.
- 2) Manderbach Ford's records were in order
- 3) Five violations were noted during the July 12th site inspection the five violations are listed below, all of the violations found on July 12 were corrected when I returned for the records review on July 14th. Violations will be noted as violations found and immediately corrected.

Violations:

- 1) Container storage areas inspected at least weekly – violation of 25 PA Code 265a.1 and 40 CFR 265.174
- 2) Proper containment and collection systems in place – violation of 25 PA Code 265a.179
- 3) Containers clearly marked with accumulation date and visible for inspection – violation of 25 PA Code 262a.10 and 40 CFR 262.34(a)(2)
- 4) Containers labeled "Hazardous Waste" – violation of 25 PA Code 262a.10 and 40 CFR 262.34(a)(3)
- 5) Containers labeled accurately identify contents – violation of SWMA 6018.403(b)(2)

Recommendations:

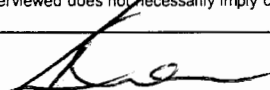
- 1) Continue to label drums and inspect storage area on a weekly basis
- 2) Ensure that all employees who handle hazardous waste are trained

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed



(Signature)

Date

7/14/06

Inspector



(Signature)

Date

7/18/06





COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

GENERAL INSPECTION REPORT

Type of Inspection CEI	WM Identification Number PAD987335247	Entry Time/Date 14:00 7/14/06	Exit Time/Date 7/14/06
Facility/Incident Name and Location Manderbach Ford 4450 5th St Highway Temple, PA 19560			Municipality Muhlenberg Twp County Berks
Name, Address of Responsible Official Keith Nolan		Title Service Manager	Telephone 610-929-3673
		Interviewed Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
REMARKS:			

On July 12, 2006 I started a Compliance Evaluation inspection at Manderbach Ford. The inspection was completed on July 14, 2006. Keith Nolan accompanied me on the site tour and records review.

Violations were noted on 7/14/06 on the site tour:

- 1) Storage areas inspected weekly - 25 PA Code 265a.1 40 CFR 265.174
- 2) Proper Containment - 25 PA Code 265a.179
- 3) Containers marked w/ accumulation date - 25 PA Code 262a.10 40 CFR 262.34(a)(2)
- 4) Containers labeled "Hazardous Waste" - 25 PA Code 262a.10 40 CFR 262.34(a)(3)
- 5) Containers labeled to identify contents - 25 PA Code 262a.10 40 CFR 262.34(a)(3)

On July 14, 2006 when the records review was conducted the above 5 violations were corrected. Manderbach's paperwork and records were in order.

A detailed Report will follow.

Inspector Name Brian L. Moore	Inspector Signature 	Headquarters Reading District Office	Date 7/14/06
			Telephone 610-916-0100
Person Interviewed Name Keith Nolan	Signature of Person Interviewed 	Title Service Manager	Telephone 610-929-3673

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